



COATED AND SPECIALTY PAPERS DIVISION

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March 29, 2006

Ms. Rhonda Thompson
Air Toxics Section
SCDHEC Bureau of Air Quality
2600 Bull Street
Columbia, SC 29201-1708

Re: Notification of Compliance Status; 40 CFR Subpart JJJJ
Bowater Incorporated, Coated and Specialty Papers Division
TV-2440-0005

Dear Ms. Thompson:

The purpose of this submittal is to fulfill the reporting requirements of 40 CFR 63.9(h), Notification of Compliance Status for designated sources under 40 CFR 63.3300. Sources included in the regulations are the No. 1 Paper Machine Coater and the No. 2 Paper Machine Coater. The rule became effective December 5, 2005.

No. 3 Coated Paper Machine does not meet the definition of a web coating line because there is no unwind station to feed finished paper to the coating work station. The coating process is the next sequential step in the coated paper manufacturing process.

Listed below is the information required by 40 CFR 63.9(h) for the No. 1 and No. 2 Paper Machine Coaters:

A) Methods that were used to determine compliance.

All coating materials were identified and the organic HAP content of each coating was determined. Calculations were conducted for each formulation to determine the "as-applied" HAP content as required by 40 CFR 63.3370.

B) Results of any performance tests, opacity or visible emission observations, CMS performance evaluations, and/or other monitoring procedures that were conducted.

The "as-applied" HAP content for each coating formulation used was below the MACT limit of 0.04 kg HAP / kg coating.

C) Methods used for determining continuing compliance, including a description of monitoring and reporting requirements and test methods.

Monthly coating usage data is maintained on-site.

D) Type and quantity of HAPs emitted by the source (or surrogate pollutant) reported in units and averaging times and in accordance with the test methods specified in the relevant standard.

Maximum organic HAP content of any coating formulation as applied is 0.0005 kg HAP / kg coating based on vendor supplied information and following the procedures of 63.3370(c).

E) If relevant standard applies to both major and area sources, an analysis demonstrating whether the affected source is a major source.

The mill is a major source of HAPs and is also subject to the MACT Standard Subpart S for Pulp and Paper Sources and Subpart MM for Kraft chemical recovery systems.

F) Description of the air pollution control equipment for each emission point, including each control device for each HAP and the control efficiency for each control device.

Only low HAP-Coating Materials are applied to the paper.

Based on the initial calculations for coating formulations used and the maximum organic HAP content, Bowater has demonstrated compliance with the applicable requirements of 40 CFR 63, Subpart JJJJ, National Emission Standards for Paper and Other Web Surface Coating Operations.

To the best of my knowledge, information, and belief formed after reasonable inquiry; the information submitted is true, accurate, and complete. If you have any questions or require additional information, please contact Jacquelyn Taylor at 803-981-8759 or electronically at taylorjb@bowater.com.

Sincerely,



Dale Herendeen
Environmental Manager

dlh/jbt
File 233.00

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